## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	) Bankruptcy No. 18-24679
JEANETTA JOHNSON- WHITE,	) ) Chapter 13
Debtors,	)
	)
	)
JEANETTA JOHNSON-WHITE,	)
Movants,	) )
v.	)
RONDA J. WINNECOUR,	)
CHAPTER 13 TRUSTEE,	)
Respondent.	)

## <u>DECLARATION CERTIFYING THE DEBTORS EXISTING CHAPTER 13 PLAN IS</u> <u>SUFFICIENT TO PAY THE NEW MORTGAGE AMOUNT</u>

Movants, by their attorney, Joseph P. Nigro, Esquire, and Nigro and Associates, LLC, hereby files this Declaration and avers the following:

1. Wilmington Savings Fund Society, FSB, as trustee of Stanwich Mortgage Loan Trust filed a Notice of Mortgage Payment Change for a mortgage amount change to \$506.40.

- 2. Debtors Chapter 13 Plan pays Wilmington Savings Fund Society, FSB, as trustee of Stanwich Mortgage Loan Trust \$553.25 for the mortgage payment.
- 3. Therefore, Since the new mortgage amount is \$506.40 and this amount is less than the amount currently under the Plan in the amount of \$553.25, no amendment is required to the Chapter 13 Plan.

Respectfully submitted,

12/06/2022 Date /s/ Joseph P. Nigro JOSEPH P. NIGRO, ESQUIRE PA I.D. NO. 47810 Attorney for Movant NIGRO & ASSOCIATES, LLC 1330 Old Freeport Road, Suite 3BF Pittsburgh, PA 15238 (412) 471-8118

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